

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**JEFFERSON-PILOT LIFE
INSURANCE CO.,**

Plaintiff

VS.

CHRISTOPHER L. KEARNEY,

Defendant.

VS.

**DISABILITY MANAGEMENT
SERVICES, INC.**

Third-party Defendant

CASE NO. C-1-02-479

JUDGE BARRETT
Magistrate Judge Hogan

**MOTION TO MANUALLY FILE
UNDER SEAL EXHIBIT 1 TO
DOCUMENT 124**

The defendant, Christopher Kearney, hereby moves the court for permission to file under seal and manually Exhibit 1 to Document 124. A Memorandum in Support is attached. Due to its bulk, it could not be filed at the time Document 124 was filed (yesterday).

Respectfully submitted,

s/ Michael A. Roberts
Michael A. Roberts (0047129)
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MEMORANDUM IN SUPPORT

As discussed with the Court's Law Clerk, on November 29, 2006, and as displayed by the courtesy copy of Exhibit 1 to document 124 shared with the Court on November 29, 2006, the several hundred page Exhibit 1 contains an extraordinary volume of private medical, financial and other information relating to the defendant, Chris Kearney. For that reason, the defendant moves the Court for permission to file the entire Exhibit manually and under seal.

Respectfully submitted,

s/ Michael A. Roberts
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed electronically with the court and thereby served this 30th day of November, 2006, upon William R. Ellis, Wood & Lamping LLP, 600 Vine Street, Suite 2500, Cincinnati, OH 45202.

s/ Michael A. Roberts